

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:13-00320

REGINALD B. BENNETT

**SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA
TO DEFENDANT'S STANDARD DISCOVERY REQUESTS AND
REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY**

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case on December 31, 2013, the United States of America, by counsel, herewith supplements to each of defendant's Standard Discovery Requests as follows:

Request E: Permit the defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, building or places, or copies or portions of any of those items, if the item is within the government's possession, custody or control, and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to defendant. [Fed. R. Crim. P. 16(a)(1)(E)]

Response: Attached you will find the following:

1. Forensic Laboratory Report and Case Submission Form pertaining to Reginald B. Bennett (BENNETT - 00107-00112);

2. A certified copy of the records of the Circuit Court of Baltimore County, Maryland relating to Reginald B. Bennett dated January 8, 2014 (BENNETT - 00113-00117);

3. Certified copy of no pardon letter dated January 13, 2014 from David R. Blumberg, Department of Public Safety and Correctional Services relating to Reginald B. Bennett (BENNETT - 00118);

4. A copy of the Firearms Trace Summary Report dated January 9, 2014 as prepared by Eric Hodges, Charleston Police Department (BENNETT - 00120);

5. A copy of the case history information sheet from Kanawha County Magistrate Court relating to State of WV v. Reginald Bernard Bennett, Case No. 13F-2968, indicating that the charge of Felon in Possession of a Firearm was dismissed on September 20, 2013 (BENNETT - 00121).

Request G: Give to the defendant a written summary of any testimony the government intends to use under Rules 702, 703 or 705 of the Federal Rules of Evidence during its case-in-chief at trial. If the government requests discovery under Federal Rules of Criminal Procedure 16(b)(1)(C)(ii) and the defendant complies, the government must, at the defendant's request, give to the defendant a written summary of testimony that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence as evidence at trial on the issue of the defendant's mental condition. The summary must describe the witness's opinions, the bases and reasons for those opinions, and the witness's qualifications. [Fed. R. Crim. P. 16(a)(1)(G)]

Response: Attached is a copy of a report dated January 13, 2014 as submitted by G. Robert Cunningham, ATF Special Agent (BENNETT - 00119).

REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY

Pursuant to Rules 16.1(b) and 16.1(d) of the Local Rules of Criminal Procedure, the United States of America requests that defendant provide all applicable reciprocal discovery within 14 days of the service of this response and the provision of materials requested by defendant in the Standard Discovery Request.

Respectfully submitted,

R. BOOTH GOODWIN II
United States Attorney

By:

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 23rd day of January, 2014 to:

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